

## 3.2. Agricultural and Forestry Resources

This section addresses potential agricultural and forestry impacts that may result from construction and/or operation of the Belmont Village Encinitas-by-the-Sea Project. The following discussion addresses the existing conditions in the project area, identifies applicable regulations, identifies and analyzes environmental impacts, and recommends measures to reduce or avoid adverse impacts anticipated from implementation of the project, as applicable.

Information used in preparing the evaluation of potential impacts on agricultural and forestry resources was derived from a number of sources including the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) and the Land Evaluation and Site Assessment (LESA) prepared by Birdseye Planning Group (2018). The LESA was peer reviewed by BRG Consulting Inc. and is included as Appendix C. No forestry resources are present within the Project area, and therefore, this section focuses on issues related to agricultural resources.

### Scoping Issues Addressed

During the scoping period for the Project, a scoping meeting was conducted and written comments were received from agencies and the public. No comments related to agricultural resources were raised.

#### 3.2.1. Existing Conditions

##### *Regional Setting*

The Project site is located at 3111 Manchester Ave., in the Cardiff-by-the-Sea community of Encinitas, San Diego County, California, and has historically been used for agricultural production, primarily strawberries and Asian vegetables. The Project site is zoned Rural Residential 2 (RR-2), which allows single-family residential development. With the approval of A Major Use Permit, a senior living facility also is an allowable use within this zone.

San Diego's Mediterranean-like climate makes it an ideal place to grow agricultural crops and livestock products. Irrigated agricultural products grown in the County include a variety of nursery and cut flower products, fruit and nut crops, vegetable and vine crops, field crops, as well as livestock and poultry products. According to the San Diego County Crop Statistics and Annual Report for 2017, the top 10 County-wide commodities, in terms of dollar value included:

- ornamental trees and shrubs;
- indoor flowering and foliage plants;
- bedding plants;
- avocados;
- cacti and succulents;
- lemons;
- tomatoes;
- other cut flower products and bulbs;
- oranges; and
- eggs/chicken meat

The total harvested acreage in the County for 2016 was 243,029, and the County's gross annual agricultural value totaled \$1,774,206,410 (County of San Diego, 2017).

### ***Project Site Zoning***

Pursuant to the City of Encinitas General Plan, the Project site is designated for residential uses, and is zoned RR-2 (Rural Residential 2), which provides for low density single-family detached residential units. Title 30 of the Encinitas Municipal Code, Zoning, Chapter 30.09 (Zoning Use Matrix), also referred to as the Zoning Code, indicates that "residential care facilities (for 7 or more)" are permitted in the RR-2 zone (City of Encinitas, 2019), subject to the City's approval of a conditional use permit (major). Attached single-family units are also allowed, provided each unit is located on a separate legal lot and submitted to the City for a Planned Residential Development Permit (PRD).

### ***Land Evaluation and Assessment Model***

The California Agriculture Land Evaluation and Assessment (LESA) Model was used to rate the quality and availability of agricultural resources on the Project site and to identify whether the proposed Project would meet the threshold criteria of having a significant impact on agricultural resources under California Environmental Quality Act (CEQA) Guidelines. The LESA evaluates land use and site assessment factors to determine whether a proposed project would result in a significant agricultural resources impact.

The LESA evaluates measures of soil resource quality, project size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a Land Evaluation (LE) sub-score and a Site Assessment (SA) sub-score. The sub-scores are combined to determine a single numeric score. A project's single numeric score becomes the basis for making a determination of a project's potential significance, based upon a range of established scoring thresholds (Dept. of Conservation, 2011).

### ***Conversion of Agricultural Land***

The California Department of Conservation (Dept. of Conservation) monitors the conversion of the state's farmland through the Farmland Mapping and Monitoring Program (FMMP). Table 3.2-1 summarizes the conversions of agricultural land to non-agricultural uses within San Diego County from 2010 to 2012 (Dept. of Conservation, 2015) and represents the most recent data available at the time of the Draft EIR's publication.

As shown in Table 3.2-1, there was a net loss of 3,128 acres of Important Farmlands in San Diego County between 2010 and 2012. The conversion of farmland in the Prime and Statewide categories was primarily due to conversions of potted plant nurseries to in-ground, irrigated agriculture. The

conversion of Farmland of Local Importance was primarily due to land left idle or land used for dryland grain production for three or more update cycles (Dept. of Conservation, 2015).

**TABLE 3.2-1 CONVERSION OF AGRICULTURAL LAND TO NON-AGRICULTURAL LAND  
WITHIN SAN DIEGO COUNTY**

Land Use Category	Total Acreage Inventoried		2010-2012 Acreage Changes			
	2010	2012	Acres Lost (-)	Acres Gained (+)	Total Acreage Changed	Net Acreage Changed
<b>Important Farmland</b>						
Prime Farmland	7,084	6,989	-414	319	733	-95
Farmland of Statewide Importance	9,440	8,836	1,101	497	1,598	-604
Unique Farmland	48,539	47,458	2,271	1,370	3,641	-901
Farmland of Local Importance	154,038	152,510	4,661	3,133	7,794	-1,528
<b>Important Farmland Subtotal</b>	<b>218,921</b>	<b>215,793</b>	<b>8,447</b>	<b>5,319</b>	<b>13,766</b>	<b>-3,128</b>
Grazing Land	126,495	125,017	1,567	89	1,656	-1,478
<b>Agricultural Land Subtotal</b>	<b>345,416</b>	<b>340,810</b>	<b>10,014</b>	<b>5,408</b>	<b>15,422</b>	<b>-4,606</b>
Urban and Built-Up Land	355,144	360,919	541	6,316	6,857	5,775
Other Land	1,452,833	1,451,664	6,399	5,230	11,629	-1,169
Water Area	13,298	13,298	0	0	0	0
<b>Total Area Inventoried</b>	<b>2,166,691</b>	<b>2,166,691</b>	<b>16,954</b>	<b>16,954</b>	<b>33,908</b>	<b>0</b>

Source: Dept. of Conservation, 2015.

### ***Agricultural Soil Productivity***

The U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) uses two systems to assess a soil's agricultural productivity: the Soil Capability Classification System and the Storie Index Rating System. Under both systems, the prime soil classifications would require the least application of management techniques to produce a consistent and high yield of agricultural products. Common management techniques that are used on non-prime soils include fertilization and drainage or leveling of an area.

#### **Soil Capability Classification System**

Under the Soil Capability Classification System, soils are characterized according to their appearance, depth, consistency, slope, and erosion factors. The soil survey groups the various soil types into eight Soil Capability Classes. These classes are indicated in Table 3.2-2. Soils are graded I through VIII, with Class I denoting the most suitable class and VIII denoting the least suitable class for cultivation.

**TABLE 3.2-2 SOIL CAPABILITY CLASSIFICATION**

<b>Class</b>	<b>Description</b>
I	Soils have few limitations that restrict their use.
II	Soils have moderate limitations that reduce the choice of plants or that require special conservation practices.
III	Soils have severe limitations that reduce the choice of plants or that require special conservation practices or both.
IV	Soils have very severe limitations that reduce the choice of plants or that require very careful management or both.
V	Soils are not likely to erode but have other limitations, impractical to remove, that limit their use.
VI	Soils have severe limitations that make them generally unsuitable for cultivation.
VII	Soils have very severe limitations that make them unsuitable for cultivation.
VIII	Soils and landforms have limitations that nearly preclude their use for commercial crop production.

Source: USDA 1981.

***Storie Index Rating System***

Soils are also rated by the Storie Index, a numerical system expressing the relative degree of suitability or value of a soil for general intensive agriculture use. The index considers a soil's color and texture, the depth of nutrients, presence of stones, and slope, all of which relate to the adequacy of a soil type for use in crop cultivation. The rating does not take into account other factors such as the availability of water for irrigation, the climate, and the distance from markets. Values of the index range from 1 to 100 and are divided into six grades, with an index of 100 and a grade of 1 being the most suitable and a grade of 6 being the least suitable for farming.

Soils that have a Storie rating of 10 or below are considered to have a very low agricultural potential. Soils are considered to be prime for high-quality agricultural production if their Storie Index Rating is 80 or greater. Table 3.2-3 lists the six NRCS soil grades, ranges in index rating, and definitions for each soil grade.

**TABLE 3.2-3 STORIE INDEX RATING SYSTEM**

<b>Grade</b>	<b>Storie Index Rating</b>	<b>Description</b>
1 - Excellent	80 through 100	Soils are well suited for growing irrigated crops that are climatically suited to the region.
2 - Good	60 through 79	Soils are good agricultural soils, although they may not be as desirable as Grade 1 because of moderately coarse or gravelly surface soil texture; somewhat less permeable subsoil; lower plant-available water holding

**TABLE 3.2-3 STORIE INDEX RATING SYSTEM**

Grade	Storie Index Rating	Description
		capacity, fair fertility; less well-drained conditions or slight to moderate flood hazards, all acting separately or in combination.
3 – Fair	40 through 59	Soils are only fairly well suited to general agricultural use and are limited in their use because of moderate slopes; moderate soil depths; less permeable subsoil; fine, moderately fine, or gravelly surface soil textures; poor drainage; moderate flood hazards; or fair to poor fertility levels, all acting alone or in combination.
4 - Poor	20 through 39	Soils are poorly suited. They are severely limited in their agricultural potential because of shallow soil depths; less permeable subsoil; steeper slope; or more clayey or gravelly surface soil textures than Grade 3 soils, as well as poor drainage; greater flood hazards; hummocky micro-relief; salinity; or fair to poor fertility levels, all acting alone or in combination.
5 - Very Poor	10 through 19	Soils are very poorly suited for agriculture, are seldom cultivated and are more commonly used for range, pasture, or woodland.
6 - Nonagricultural	Less than 10	Soils are not suited for agriculture at all due to very severe to extreme physical limitations, or because of urbanization.

Source: USDA, 1981.

***Farmland Mapping and Monitoring Program***

The Farmland Mapping and Monitoring Program produces Important Farmland maps, which are a hybrid of soil resource quality and land use information. USDA soil survey information and the corresponding Important Farmland candidacy recommendations are used to assess local land. The goal of the program is to provide consistent and impartial data to decision makers for use in assessing present status, reviewing trends, and planning for the future of California's agricultural land resources. The categories of Important Farmlands mapped by the FMMP in San Diego County are presented on Table 3.2-4.

**TABLE 3.2-4. CATEGORIES OF IMPORTANT FARMLANDS IN SAN DIEGO COUNTY**

Farmland Category	Definition
Prime Farmland.	Has the best combination of physical and chemical features able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. To be classified as Prime Farmland, this land must have been producing irrigated crops at some time during the four years prior to the mapping date.
Unique Farmland	Consists of lesser quality soils used for the production of the state's leading agricultural crops. This land is usually irrigated but may include non-irrigated orchards or vineyards, as found in some climatic zones in California. The land must have been cultivated at some time during the four years prior to the mapping date.

**TABLE 3.2-4. CATEGORIES OF IMPORTANT FARMLANDS IN SAN DIEGO COUNTY**

<b>Farmland Category</b>	<b>Definition</b>
Farmland of Statewide Importance	Similar to Prime Farmland but with minor shortcomings such as greater slopes or with less ability to hold and store moisture. The land must have been used for the production of irrigated crops at some time during the four years prior to the mapping date.
Farmland of Local Importance	Land of importance to the local economy, as defined by each county's board of supervisors and a local advisory committee. In San Diego County, Farmland of Local Importance includes non-irrigated and uncultivated lands with Prime and Statewide soils that do not qualify as Prime, Statewide, or Unique but are currently irrigated crops or pasture or non-irrigated crops; lands that would meet the Prime or Statewide designation and have been improved for irrigation but are now idle; and lands that currently support confined livestock, poultry operations, and aquaculture.
Grazing Land	Land on which the existing vegetation, whether grown naturally or through management, is suited for grazing livestock. The minimum mapping unit for this category is 40-acres.
Urban and Built-Up Land	Urban and Built-Up Land is occupied by structures with a building density of at least one unit to 1.5-acres, or approximately six structures. Common examples include residential, industrial, commercial, and institutional facilities; cemeteries; airports; golf courses; sanitary landfills; sewage treatment plants; and water control.
Water	This category consists of perennial water bodies with an extent of at least 40-acres.
Other Land	Other Land is land that is not included in any other mapping category. Common examples include low-density rural developments; brush; timber; wetland; riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities; strip mines; borrow pits; and water bodies smaller than 40-acres. Vacant and non-agricultural land surrounded on all sides by urban development and greater than 40-acres is mapped as Other Land.

Source: Dept. of Conservation, 2015.

***Acreage of Important Farmland on the Project Site***

Based on a review of the FMMP 2016 Important Farmland Map for San Diego County, the Project site contains no Prime Farmland, no Farmland of Statewide Importance, approximately 8.38 acres of Farmland of Local Importance and approximately 10.65 acres of "Urban and Built-Up" lands or "Other Lands". The site is not subject to the provisions of a Williamson Act contract (Dept. of Conservation, 2014).

Table 3.2-5 provides the approximate acreage of Important Farmlands on the Project site as shown on Figure 3.2-1.

**TABLE 3.2-5 IMPORTANT FARMLANDS ON PROJECT SITE**

<b>Classification</b>	<b>Approximate Acreage</b>
Prime Farmland	0.00
Farmland of Statewide Importance	0.00
Farmland of Local Importance	8.38
Grazing Land	0.00
Urban and Built-Up Land	0.00
Water	0.00
Other Lands	10.65
<b>TOTAL</b>	<b>19.03</b>

Source: California Department of Conservation 2016a.

### ***Production and Soil Characteristics***

The following discussion is summarized from the LESA (Birdseye Planning Group, 2018) which is included as Appendix C.

As discussed above, the Storie Index provides a numeric index (based upon a 100-point scale) of the relative degree of suitability or value of a given soil for intensive agriculture use. This rating is based upon the following soil characteristics only: soil color and texture, depth of nutrients, presence of stones, and slope. The Project site contains Corralitos loamy-sand (CsC) (5-9% slopes), which has a Storie Index rating of 61 and is a Capability Class III-s soil (Birdseye Planning Group, 2018). As shown in Table 3.2-3, Class III soils have severe limitations which minimizes the selection of plants, requires special conservation practices or both (Birdseye Planning Group, 2018). Thus, Class III soils are not Prime soils under the Dept. of Conservation, or the USDA's definitions, unless they are irrigated.

The LESA assigns ratings to each land capability class and multiplies that number by the proportion of a project area that contains each soil class to find the Land Capability Classification (LCC) score. This analysis assumes the entire Project area is Corralito loamy sand. A Storie Index score is calculated by multiplying the proportion of the Project within each soil type by the soil type's Storie Index rating (Birdseye Planning Group, 2018).

Table 3.2-6 provides a summary of the LE and SA scores. The final LE and SA scores are entered into the Final LESA Score Sheet as shown in Table 3.2-4. In this case, Class III-s soils have an LCC Rating of 60 (Dept. of Conservation, 1997). Because 100% of the Project site has Class III-s soils and a Storie Index of 61, the Storie Index Rating score is 61 (Birdseye Planning Group, 2018).

**TABLE 3.2-6 SUMMARY OF LESA ANALYSIS**

	<b>Factor Rating (0 - 100 Points)</b>	<b>Factor Weighting (Total = 1.00)</b>	<b>Weighted Factor Rating</b>
<b>I. SCORE SHEET SUMMARY</b>			
<b>Land Evaluation (LE)</b>			
1. Land Capability Classification	60	0.25	15.00
2. Storie Index Rating	61	0.25	15.25
<b>LE Subtotal</b>		<b>0.50</b>	<b>30.25</b>
<b>Site Assessment (SA)</b>			
1. Project Size	10	0.15	1.50
2. Water Resource Availability	100	0.15	15.00
3. Surrounding Agricultural Lands	0	0.15	0
4. Protected Resource Lands	0	0.05	0
<b>SA Subtotal</b>		<b>0.50</b>	<b>16.50</b>
<b>TOTAL LESA SCORE (LE +SA)</b>		<b>1.00</b>	<b>46.75</b>
<b>II. LESA MODEL SCORING THRESHOLDS</b>			
Total LESA Score	Scoring Decision		
0 to 39 Points	Not considered significant		
40 to 59 Points	Considered significant only if LE <u>and</u> SA subscores are greater than or equal to 20 points		
60 to 79 Points	Considered significant unless either LE or SA subscore is less 0 than 20 points		
80 to 100 Points	Considered significant		

Source: Birdseye Planning Group, 2018 (Appendix C)

### 3.2.2. Regulatory Framework

#### *Federal and State*

##### Farmland Protection Policy Act

The Farmland Protection Policy Act (FPPA) (7 USC 4201 and 7 CFR Ch. VI Part 658) was passed by Congress in 1981. It has three purposes: minimize the impact federal programs have on the unnecessary and irreversible conversion of farmland to non-agricultural uses; consider alternative actions; and assures that—to the extent possible—federal programs are administered to be



compatible with state, local units of government, and private programs and policies to protect farmland. The FPPA is overseen by the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS) (NRCS, 2013).

#### California Land Conservation Act (Williamson Act)

The California Land Conservation Act of 1965, also known as the Williamson Act, has been the state's primary agricultural land protection program since it was enacted in 1965. Since its inception, more than half of the State's 31.4 million acres of farm and ranch land have participated in the program. Of California's 58 counties, 52 have executed Land Conservation Act (LCA) contracts with landowners. Private landowners voluntarily restrict their land to agricultural and compatible open-space uses under primarily 10- or 20-year rolling term contracts with local governments such as their city or county. In return, restricted parcels are assessed for property tax purposes at a rate consistent with their actual use, rather than potential market value (Dept. of Conservation, 2016b).

No portion of the Project Site is currently under a Williamson Act contract (Dept. of Conservation, 2014). Therefore, conversion of land under an LCA on the Project Site is not an issue and will not be discussed in the analysis of impacts.

#### California Coastal Act

The California Coastal Act has specific language and standards applicable to agricultural lands. Section 30241 of the Coastal Act states that farmland within the Coastal Zone must meet any of the following criteria to be designated as Prime Farmland:

- 1) Have a NRCS soil classification of Class I or II;
- 2) Have a Storie Index Rating of 80 through 100;
- 3) Have the ability to support livestock, at least one animal unit per acre as defined by the USDA; or
- 4) Have been planted with fruit or nut bearing trees, vines, bushes or crops that have a nonbearing period of fewer than five years and that will normally return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than \$200 per acre.

### ***Local***

#### City of Encinitas General Plan

The City of Encinitas General Plan establishes community goals and policies designed to shape the long-term development of the City as well as protect its environmental, social, cultural and economic

resources. The Resource Management Element of the General Plan addresses the city's natural and cultural resources, including agriculture.

### Resource Management Element

- GOAL 12: The City will encourage the preservation of "prime" agriculture lands within its sphere of influence. (Coastal Act/30241)
- POLICY 12. 1: For the purpose of this plan and the LCP, "prime" agriculture is defined as land in the sphere of influence of the City of Encinitas Coastal Zone presently producing or with the future potential for commercial production of agricultural products and with a soil classification of Class I-IV. (Coastal Act/30241)
- POLICY 12. 2: No "prime" agriculture lands are located within the City of Encinitas Coastal Zone. However, the Ecke Holdings, et. al. are within the City of Encinitas' Coastal Zone sphere of influence, and may, therefore, be influenced by the City's LCP and General Plan policies. The City recognizes this land as "prime" agriculture suitability and as such, designates it for long term preservation as "Agriculture/Open Space Preserve." (Coastal Act/30241)

### **3.2.3. Analysis of Project Effects and Significance Determination**

This section lists the thresholds used to conclude whether an agricultural or forestry impact would be significant, describes in impact analysis for the project relative to such thresholds, and identifies mitigation measures, as appropriate, to avoid or to reduce significant impacts.

#### ***Guidelines for Determination of Significance***

A project would be considered to have a significant impact if it would:

- 1) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.
- 2) Conflict with existing zoning for agricultural use, or a Williamson Act contract.
- 3) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).
- 4) Result in the loss of forest land or conversion of forest land to non-forest use.

- 5) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.

### ***Issues Not Discussed Further***

#### Agricultural Zoning, Williamson Act Contracts and Forest Land

The Project site is not subject to a Williamson Act Contract (Dept. of Conservation 2014), nor is it designated or zoned for agricultural use. The Project site is zoned RR-2 (Rural Residential) and would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC Section 12220(g)), timberland (as defined by PRC Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). Therefore, there would be no impact relative to conflicts with zoning for agricultural use, forests, timberland, or with Williamson Act contracts. These issues are not evaluated further.

### ***Analysis***

---

#### **Impact 3.2-1: Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.**

---

The proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use, according to the California FMMP maps for San Diego County. No Prime Farmland, Unique Farmland, or Farmlands of Statewide Importance (Farmland) are mapped on the Project site (Dept. of Conservation, 2016a). According to the 2016 FMMP map for the western part of San Diego County, the Project site contains lands designated as Farmland of Local Importance and Other Land (Dept. of Conservation 2016a). No Prime Farmland, Unique Farmland, or Farmlands of Statewide Importance (Farmland) are mapped on the Project site.

A LESA analysis was performed to assess whether the Project's conversion of agricultural land to non-agricultural use would constitute a significant impact (see Appendix C). The LESA Model is an approach used to rate the relative quality of land resources based upon six specific measurable features. Two land evaluation factors are based upon measures of soil resource quality. Four site assessment factors provide measures of a given project's size, water resource availability, surrounding agricultural lands, and surrounding protected resource lands. Table 3.2-6 provides a summary of the LESA analysis.

The LESA Model is weighted so that one-half of the total score is derived from the Land Evaluation (LE) and one half from the Site Assessment (SA). As shown in Table 3.2-6, the Project's LE subscore is 30.25, while the SA subscore is 16.5. The final LESA score is 46.75. A final LESA score between 40 and 59 is considered significant only if both the LE and SA sub-scores are each greater than or equal to 20 points. In this case, the LE subscore is greater than 20 points (30.25); however,

the SA subscore is less than 20 (16.50). Therefore, the LESA Model found that conversion of the Project site to non-agricultural use would not constitute a significant impact.

While the California Coastal Act seeks to preserve Prime farmland within the Coastal Zone the Project site does not meet the Coastal Commission's criteria for prime agricultural land for the following reasons:

- The Project site is zoned RR-2, for residential use. It is not zoned for agricultural use;
- The Project site is located contiguous with existing residential (i.e., developed) areas and is located within an area with adequate public services to support the proposed uses (See Section 4.8, Public Services and Facilities);
- The Project site is not surrounded by agricultural developments; thus, development of residential uses on the Project site would have no physical impact on surrounding agricultural uses; and,
- The City of Encinitas General Plan Resource Management Element indicates that there are no "prime" agriculture lands within the City of Encinitas Coastal Zone (City of Encinitas, 2011).

Therefore, there would be no impact under this criterion.

---

**Impact 3.2-2: Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use.**

---

The proposed Project does not include changes in the existing environment which, due to their location or nature would result in the conversion of neighboring farmland to non-agricultural use. The Project area is surrounded by land that is either developed, under development or within an ecological preserve (San Elijo Lagoon).

Therefore, the proposed Project would not result in the conversion of farmlands off-site to non-agricultural uses, and conversion of onsite Farmland of Local Importance would not be considered a significant impact according to the LESA results and the California Coastal Act. Impacts under this criterion would be less than significant, and no mitigation would be required.

#### **3.2.4. Mitigation Measures**

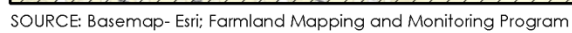
The proposed Project would not result in significant impacts to agricultural resources and no mitigation measures would be required.

#### **3.2.5. Cumulative Impact Analysis**

Other development projects in the region, shown on Table 2-5, Potential Cumulative Projects, would also involve ground disturbances and could convert important farmlands to non-agricultural uses, if present. The majority of existing, approved, proposed, and other reasonably foreseeable projects

listed on Table 2-5 are not located on sites that support agricultural uses. The only exception would be one of the Candidate sites included in the 2019 Housing element Update. Candidate Site #9 is located within the Encinitas Ranch Specific Plan and is zoned ER-AG (Encinitas Ranch – Agriculture Zone). Candidate Site #9 is mapped as Unique Farmland and is currently used as a flower nursery.

Mitigation measures will be imposed on the potential cumulative projects, which will minimize the Projects' contribution to the cumulative impact to the extent possible. Therefore, the proposed Project, in combination with the development of other existing, proposed, and reasonably foreseeable projects would not incrementally contribute to the cumulative impact of the loss of important agricultural land, and the impact would be less than cumulatively considerable.



## Farmland Mapping and Monitoring Program Designations

Belmont Village Encinitas-by-the-Sea  
Figure 3.2-1